



**Mississippi Department of Mental Health Home and Community-Based Services
Heightened Scrutiny Evaluation**

Summary Sheet

Provider Name	Brandi's Hope
Setting Name	Brandi's Hope Huntington
Setting Address	
	Gulfport, MS 39503
Original Site Assessment Date	10/11/2018
Validation Date	06/26/2020

Setting Type

- Supervised Living
- Shared Supported Living
- Supported Living
- Day Services – Adult
- Day Habilitation
- Prevocational Services
- Community Services

Heightened Scrutiny Category

- Located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment (such as a hospital, nursing facility, ICF/IID, or IMD);
- Located in a building on the grounds of, or adjacent to, a public institution; or
- Has the effect of isolating individuals receiving Medicaid home- and community-based services (HCBS) from the broader community of individuals not receiving Medicaid HCBS

Setting Description

This setting is located in a neighborhood surrounded by other homes. There are 4 additional homes in the immediate area which are owned and operated by this provider. This setting is a residential home similar in size and style to other residences in the neighborhood.

Summary of Initial Assessment Findings	10-11-2018
<p>1B) Backyard is surrounded by a high fence.</p> <p>1E, 1F) Staff stated that there is a total of 4 sites in the area operated by the provider and where individuals with disabilities live together.</p> <p>1K) Activities must be approved by the supervisor. The example given was a movie that the staff took an individual to see that the supervisor deemed inappropriate. This site supports adults over the age of 18.</p> <p>1N) Staff are required to with the individuals on walks.</p> <p>1Q) Debit cards are kept locked up by the staff.</p> <p>2F) Staff stated that the individuals did not know who to talk to if they want to change roommates/housemates.</p> <p>2G) Supervisors make decisions on housemates.</p> <p>3A) Staff decorated the common living areas.</p> <p>3B) Furnishings are not in good repair.</p> <p>3H) Personal mail is taken to the Day Program for the staff there to “handle.”</p> <p>3I) PSS and ASP are not available to staff in the home.</p> <p>3K) The staff stated that items can be stored in the bedrooms. It is unclear if the bedrooms lock and if the items are secure.</p> <p>3L,3M) The supervisor explains to the person, but it is unclear if it is presented regularly or annually.</p> <p>3O) Staffing information is posted in the home.</p> <p>4A) The backyard is surrounded by a privacy fence. Staff stated it is not locked but it is unclear if the individuals can operate the latching mechanism.</p> <p>4E) Individuals are discouraged from eating in their bedrooms due to the “mess.”</p> <p>4F) Food is not accessible 24/7.</p> <p>4H) Support is not provided to pursue religious interests or vote.</p> <p>4I) Staff state all individuals must go somewhere during the day unless there are two staff.</p> <p>4K) Menus are provided. Individuals do not participate in menu planning.</p> <p>4M) Individuals can only sleep in on the weekends.</p> <p>5A) Supervisor determines staffing for personal care.</p> <p>5D) It is unclear if the site has person-centered policies.</p> <p>5F) Staff only know how to request additional money.</p> <p>7A) Individuals do not have keys to their bedrooms.</p> <p>7B) Only staff have keys to the home.</p> <p>8A) Individuals are encouraged to eat meals when served.</p> <p>8D) Individuals do not have access to food throughout the day.</p> <p>9C) Visits must be monitored by staff.</p> <p>9D) Staff must answer the door unless it is an individual's family member.</p> <p>11C) Individuals stated that they must go on outings when they do not want to.</p> <p>11G) Individual does not feel safe enough to tell staff if they are unhappy.</p> <p>11I) Individual does not have a number to call if there is a problem.</p> <p>11N) Individual states he is not able to eat what he wants to eat.</p> <p>11P) Individuals stated they must eat meals at the table.</p> <p>11S,11T) Individuals answered they did not know.</p> <p>11Z) Individual stated he did not have a key to where he lived and that he wanted one.</p> <p>12J) Money is kept locked up and the individual is not sure how to access or ask for it.</p>	

Heightened Scrutiny Compliance Narrative with Provider Input	06-26-2020
<p>1B) The provider stated the backyard is surrounded by a privacy fence which is similar to fencing in other homes with fencing in the neighborhood. The provider stated the fencing is for privacy only and is not locked. The provider stated there is a latch on the gate easily opened and accessible to individuals in a wheelchair.</p>	

**Mississippi Home and Community-Based Services
Heightened Scrutiny Evaluation**

Setting Summary Sheet

1E, 1F) The individuals are staffed 24 hours per day 365 days per year by staff unique to the specific home. Each home has its own transportation assigned or transportation via natural supports. They do not plan activities for homes jointly including activities in community settings or in the homes themselves.

1K) The provider stated staff are trained to get to know individuals by reviewing their person-centered plan and getting to know their individual wants, needs, preferences, and goals. The provider stated staff have ongoing training on individuals' right to be treated as adults and being allowed to make their own decisions. The provider stated supervisors and direct care staff are not to make "appropriateness" decisions regarding individuals' choices. The provider said if a restriction regarding activities is determined, this must be documented in the individual's plan. The provider said policies are in place to ensure staff and individuals are aware of their rights to make decisions on their activities.

1Q) The provider said staff has been trained to make sure individuals have access to their money upon request. The provider said information regarding the individual's access to money and how to request money or control money is conveyed to individuals during their annual meeting. The provider stated staff will continue to be trained on this policy and the individual's right to have their money. Additionally, person centered plans should include individuals wants, needs, and goals associated with managing their money and finances. The provider stated ongoing training with staff and individuals will be conducted to verify individuals are aware of their rights and able to express interest in learning money management skills.

2F, 2G, 3I) The home supervisor writes training notes in the individual's case management notes and advises individuals they may change their living arrangements upon any communication from them or any circle of support member. The provider stated the setting has all private rooms which lends itself to more privacy. Each quarter Person-Center update meeting communication regarding this and other Rights, Choice and Dignity issues are standing agenda items. This will be in the Meeting Agenda and Notes in the staff's file and in the person in support Case Management file under Quarterly Person-Centered Plan Meeting. The provider stated individuals' PSS and ASP are to be kept on file in the setting as well as at the day programs. He said staff will be given access to this information while in the setting.

3A, 3B) The provider said house managers have been instructed during training meetings that individuals in the setting should have input on how common areas will be decorated and furnished. The provider stated new furniture, including replacement of a broken dresser, have been installed in the setting. The provider stated individuals in the setting will also have input on decorating the setting during holidays and special occasions.

3H) The provider stated staff have been trained on individuals' rights to open and read their mail on their own and in private. He said staff are trained to provide support or assistance with reading and understanding mail upon request. The provider explained staff have been advised individuals are not required to take their mail to their day program to open or read and that mail does not need to be handled by the supervisor. The provider indicated individuals will be advised of their rights to open and handle their mail and of the support available by staff if requested.

3K, 7A, 7B, & 11Z) The provider stated individuals are given the option to have a key to their bedroom door and to their home during admission. He stated even if an individual waives their right to a locking bedroom door and key and/or a key to their home, they have the right to request keys at any time. He said this gives individuals a way to secure their valuables. He said key locks were added to all bedroom doors and information on this right was added to the admission agreement. The provider said keys will be given to individuals who would like to have one and it will be documented in their plan and this right was added to the admission agreement.

3L, 3M) The provider stated the house manager reviews individual rights with individuals upon admission and annually thereafter. He explained individuals are also given a copy of the grievance policy during admission. He said this policy is reviewed with the individual during admission and annually thereafter. He said this frequency was added to the training manuals and policies for house managers. He said the policy was discussed in a weekly staff meeting and will be reviewed annually. The provider said the grievance policy and process will be reviewed with individuals on a regular basis including providing a phone number to file a grievance.

3O) The provider stated all staffing instructions/directions and employee information have been removed from the settings.

**Mississippi Home and Community-Based Services
Heightened Scrutiny Evaluation**

Setting Summary Sheet

4A) The provider stated the fencing around the backyard is similar to fencing at homes in the neighborhood and is for privacy only. He said gates are not locked but rather latched. He said the latch is easy to open and accessible by individuals in the setting.

4E, 4F) The provider stated staff were trained on Supervised Living policies at orientation then on an ongoing basis. The provider said information on individuals' food preferences, likes and dislikes, and any dietary restrictions are included in the individual's person-centered plan. The provider said the weekly staff meetings will include ongoing training on "getting to know" individuals and getting individuals' input on meal and menu plan. The provider stated individuals have access to the set meal or alternatives which are offered at every meal. The individuals in the setting have access to food at all times. The provider stated individuals can eat their lunch/snack at any time during the program. Individuals have full access to the kitchen including the stove/oven. Individuals also have the option to eat at restaurants within the community.

4H) The provider stated staff are trained to get to know individuals by reviewing their person-centered plan and getting to know their individual wants, needs, preferences, and goals. The provider stated staff members meet monthly with management regarding the individuals they serve. The provider stated they now staff to accommodate an individual's request to remain home or opt out of an activity or errand in the community. The provider said staff has been trained to make sure individuals have access to their money upon request. When an election timeline draws near all individuals will be given notice of coming elections and provided information on the election and candidates as well as their right to vote. The provider said staff will support individuals who wish to vote. The policy will be covered with staff in weekly meetings as well as additional trainings annually and in election years.

4I, 11C) The provider stated staff are trained to get to know individuals by reviewing their person-centered plan and getting to know their individual wants, needs, preferences, and goals. The provider stated staff members meet monthly with management regarding the individuals they serve. The provider stated they now staff to accommodate an individual's request to remain home or opt out of an activity or errand in the community.

4K, 11N) The provider stated staff were trained on Supervised Living policies at orientation then on an ongoing basis. The provider said information on individuals' food preferences, likes and dislikes, and any dietary restrictions are included in the individual's person-centered plan. The provider said the weekly staff meetings will include ongoing training on "getting to know" individuals and getting individuals' input on meal and menu plan. The provider stated individuals have access to the set meal or alternatives which are offered at every meal. The provider stated individuals have the right to choose what they do or do not want to eat in the setting and in the community.

4M) The provider stated they have updated policies and trained staff on individuals' right to set their own schedule and to decide what activities and programs they choose to join. He stated this includes individuals' right to set their own wake up and bedtimes. The provider said individuals who attend day programs or job programs will be supported to set times to get up and go to be that facilitate their ability to attend programs or jobs if they choose. The provider said individuals are educated on their right to opt out of attending a program or job. The provider said this training will be ongoing with staff and individuals.

5A) The provider stated individual requests to work with staff whom they feel most comfortable will be honored based on staff assignments and availability. He said any request by individuals for a same sex staff member to assist with personal care services would be honored.

5D, 5F, 11S, 11T) The provider stated a person-centered approach has been instated throughout the settings. He said the person-centered plans includes individual's wants, needs, goals, preferences, likes, and dislikes. He said staff has access to these plans and meet with management regularly to stay up to date on the individuals. He said staff members get to know individuals and are encouraged to engage in on going conversations with individuals about their wants, goals, and preferences. The provider said staff are encouraged to regularly check in with individuals and provide them the opportunity to request a change in their plan or services. The provider stated individuals are regularly asked about their satisfaction with their current services. He said staff are trained during their weekly management meetings on the importance of listening to the wants, needs, desires, and goals of the individuals. He said they review this policy during weekly training meetings with staff. He said individuals are informed of their right to request a change in any services they are receiving at any time. Additionally, individuals are informed of their right to participate in their planning meetings and to include anyone of their choosing (family, friends, etc.) to participate in those meetings.

**Mississippi Home and Community-Based Services
Heightened Scrutiny Evaluation**

Setting Summary Sheet

8A, 8D, & 11P) The provider stated staff were trained on Supervised Living policies at orientation then on an ongoing basis. The provider said information on individuals' food preferences, likes and dislikes, and any dietary restrictions are included in the individual's person-centered plan. The provider said the weekly staff meetings will include ongoing training on "getting to know" individuals and getting individuals' input on meal and menu plan. The provider stated individuals have access to the set meal or alternatives which are offered at every meal. The provider stated policies have been updated to allow individuals access to food at any time. The provider said staff and individuals have been trained on their right to eat what they want, when they want, where they want. He said individuals are free to have a snack of their choice and should be able to get it themselves. He said policies have been updated to allow individuals to have a snack or meal in the bedroom, outside, or in a common area if they choose.

9C, 9D) Individuals can have visitors at the setting any time of their choosing. The setting completed a remediation plan to update the individual right's policy to include dignity of risk and self-determination when it comes to making choices about their relationships with others. Individuals were educated and informed on their rights to meet with visitors privately as they choose. The provider stated staff has been trained that individuals are allowed to answer the door of the setting. The setting also trained staff on these practices. Staff were educated on these procedures. All staff will be trained upon hire, and these practices will continue to be discussed at regular staff meetings throughout the year. Documentation of these trainings is included in staff education binders.

11G, 11I) The provider stated the house manager reviews individual rights with individuals upon admission and annually thereafter. He explained individuals are also given a copy of the grievance policy during admission. He said this policy is reviewed with the individual during admission and annually thereafter. He said this frequency was added to the training manuals and policies for house managers. He said the policy was discussed in a weekly staff meeting and will be reviewed annually. The provider said the grievance policy and process will be reviewed with individuals on a regular basis including providing a phone number to file a grievance. He said individuals will be made aware of their right to voice their dissatisfaction with a staff member, policy, situation with no fear of retribution.

12J) The provider said staff has been trained to make sure individuals have access to their money upon request. The provider said information regarding the individual's access to money and how to request money or control money is conveyed to individuals during their annual meeting. The provider stated staff will continue to be trained on this policy and the individual's right to have their money.

Evidence submitted to DMH for review: P&P; ASP example; Choice and Control Instructions; staff schedule; staff training; door picture; PCT training slideshow

Compliance Summary

Compliant?	Federal Requirement	Summary of Evidence of Compliance
<p><i>42 CFR 441.304(c)(4)(i)</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	<p>The setting is integrated in and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS. <i>42 C.F.R. § 441.304(c)(4)(i).</i></p>	<p>Individuals are supported to participate in opportunities and activities, including employment, in the community. Individuals are supported to manage their personal resources. Individuals are offered learning opportunities on topics including budgeting and money management.</p>
<p><i>42 CFR § 441.301(c)(4)(ii)</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p>	<p>The setting is selected by the individual from among setting options including non-disability specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and for residential settings, resources available for room and board. <i>Id. § 441.301(c)(4)(ii).</i></p>	<p>Individuals have opportunities to choose from non-disability specific settings. Documentation of these choices and the discussions are included in the individual's person-centered service plan.</p>
<p><i>42 CFR § 441.301(c)(4)(iii)</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	<p>The setting ensures an individual's rights of privacy, dignity, respect, and freedom from coercion and restraint. <i>Id. § 441.301(c)(4)(iii).</i></p>	<p>Individuals are given a copy of their rights upon admission and information is posted in the setting. Rights are reviewed with individuals on an annual basis. Staff are required to complete ongoing training on individuals' rights.</p>
<p><i>42 CFR § 441.301(c)(4)(iv)</i></p> <p><input checked="" type="checkbox"/> Yes</p>	<p>The setting optimizes, but does not regiment, individual initiative, autonomy, and independence in</p>	<p>Individuals are supported to spend their time with whomever they choose and participating in whichever activities they enjoy. Staff have access to individuals' person-centered plans.</p>

**Mississippi Home and Community-Based Services
Heightened Scrutiny Evaluation**
Setting Summary Sheet

<input type="checkbox"/> Partial <input type="checkbox"/> No	making life choices, including but not limited to, daily activities, physical environment, and with whom to interact.	
42 CFR § 441.301(c)(4)(v) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No	The setting facilitates individual choice regarding services and supports, and who provides them.	Individuals have the choice of staff who provide his/her services, supports, and personal care. Individuals have the opportunity to adjust their work or daily activities. Staff support individuals to make a request for additional services or to make changes to their Activity Support plans.
42 CFR § 441.301(c)(4)(vi)(A) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	The unit or dwelling is a specific physical place that can be owned, rented, or occupied under a legally enforceable agreement by the individual receiving services, and the individual has, at minimum, the same responsibilities and protections from eviction that tenants have under the landlord-tenant law of the State, county, city or other designated entity. For settings where landlord-tenant laws do not apply, a lease, residency agreement, or other form of written agreement is in place for each HCBS participant providing protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord-tenant law.	Each person in the setting has a rental agreement that is signed by the individual. Most rents are HUD or Section 8 subsidized.
42 CFR § 441.301(c)(4)(vi)(B) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	Each individual has privacy in their sleeping or living unit: (1) Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors. (2) Individuals sharing units have a choice of roommates in that setting. (3) Individuals have the freedom to furnish and decorate their sleeping	Individuals in the setting have keys to their bedroom and the setting. Individuals are supported to decorate their bedroom as they choose and to their taste.

**Mississippi Home and Community-Based Services
Heightened Scrutiny Evaluation**
Setting Summary Sheet

	or living units within the lease or other agreement.	
<p>42 CFR § 441.301(c)(4)(vi)(C)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	Individuals have the freedom and support to control their schedules and activities and have access to food any time.	Individuals in the setting have access to food at all times. Individuals have full access to the kitchen including the stove/oven. Individuals also have the option to eat at restaurants within the community. Individuals are not required to eat at the dining room table. The setting removed any assumed policies prohibiting individuals from eating in their rooms or other areas of the home and completed staff training. Individuals were also educated on this change.
<p>42 CFR § 441.301(c)(4)(vi)(D)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	Individuals are able to have visitors of their choosing at any time.	Individuals can have visitors at the home any time of their choosing. The setting completed a remediation plan to update the individual right's policy to include dignity of risk and self-determination when it comes to making choices about their relationships with others. Individuals were educated and informed on their rights to meet with visitors privately as they choose. The setting also trained staff on these practices and removed other blanket restrictions such as no visitors of the opposite sex in the individual's room. Staff were educated on these procedures. All staff will be trained upon hire, and these practices will continue to be discussed at regular staff meetings throughout the year. Documentation of these trainings is included in staff education binders.
<p>42 CFR § 441.301(c)(4)(vi)(E)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	The setting is physically accessible to the individual.	The home was observed to be physically accessible to all individuals living in the home. The home included handheld showers and grab bars in the bathroom. Should an individual need any assistive devices, the setting would support the individual in providing what was needed.